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APEX MATERIALS, LLC, ELKHORN
10 ENVIRONMENTAL, LLC, WERDCO BC,
INC., WERDCO LLC, BRENT CONRAD,
11 BRANDON CONRAD, AND PATRICIA
CONRAD
12

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 LANCE D. STUCKEY, JR., Individually and
16 on behalf of all others similarly situated,,
17

18 Plaintiffs,

19 v.

20 APEX MATERIALS, LLC, ELKHORN
ENVIRONMENTAL, LLC, WERDCO BC,
INC., WERDCO LLC, BRENT CONRAD,
21 BRANDON CONRAD, PATRICIA CONRAD,
LAS VEGAS PAVING CORPORATION.,
22 TAB CONTRACTORS, INC., WILLIAM
CHARLES CONSTRUCTION COMPANY,
23 HARBER COMPANY, INC., John Does I to
XX, name fictitious true name and number of
24 persons being unknown, and XYZ Corporations
I to XX, name fictitious true name of number
of entities being unknown,

25 Defendants.
26

Case No. 2:22-cv-01964-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING TO COMPLAINT**

[FIRST REQUEST]

27 Plaintiff, LANCE D. STUCKEY, JR. ("Plaintiff"), and Defendants, APEX MATERIALS,
28 LLC, ELKHORN ENVIRONMENTAL, LLC, WERDCO BC, INC., WERDCO LLC, BRENT

CONRAD, BRANDON CONRAD, and PATRICIA CONRAD (hereinafter collectively “Defendants”), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Defendants to file a response to the Complaint from the current deadline of January 27, 2023, up to and including **February 27, 2023**. In exchange for the thirty (30) day extension of time to respond to the Complaint, Defendants agree not to dispute service of process. This is the first request for an extension of time to respond to the Complaint. The instant request for an extension is necessary because counsel for Defendants were recently retained and need additional time to investigate the allegations contained in the Complaint and prepare a sufficient responsive pleading thereto. This request is made in good faith and not for the purpose of delay.

Dated: January 25, 2023

Dated: January 25, 2023

Respectfully submitted,

Respectfully submitted,

/s/ Leon Greenberg

/s/ Montgomery Y. Paek

LEON GREENBERG, ESQ.

MONTGOMERY Y. PAEK, ESQ.

RUTHANN DEVEREAUX-GONZALEZ, ESQ.

EMIL S. KIM, ESQ.

LEON GREENBERG PROFESSIONAL CORPORATION

MICHAEL D. DISSINGER, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Plaintiff

Attorneys for Defendants

LANCE D. STUCKEY, JR.

APEX MATERIALS, LLC, ELKHORN ENVIRONMENTAL, LLC, WERDCO BC, INC., WERDCO LLC, BRENT CONRAD, BRANDON CONRAD, AND PATRICIA CONRAD

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: January 26, 2023